FILED
UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO
AUG 25 2015
MATTHEW J. DYKMAN
CLERK

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	CRIMINAL NO. 15-3051 JB
vs.	)	Count 1: 18 U.S.C. §§ 1153 and 1111: Second Degree Murder;
RICHMOND SAM,	)	
Defendant.	)	Count 2: 18 U.S.C. §§ 922(g)(1) and 924(a)(2): Felon in Possession of a Firearm and Ammunition;
	)	Count 3: 18 U.S.C. § 924(c): Using, Carrying, Possessing, and Discharging a Firearm During and in Relation to and in Furtherance of a Crime of Violence.

INDICTMENT

The Grand Jury charges:

Count 1

On or about July 30, 2015, in Indian Country, in Sandoval County, in the District of New Mexico, the Defendant, **RICHMOND SAM**, an Indian, with malice aforethought did unlawfully kill John Doe, by shooting John Doe with a firearm.

In violation of 18 U.S.C. §§ 1153 and 1111.

Count 2

On or about July 30, 2015, in Indian Country, in Sandoval County, in the District of New Mexico, the Defendant, **RICHMOND SAM**, having been convicted of the following felony crime punishable by imprisonment for a term exceeding one year:

(1) aggravated assault upon a peace officer.

knowingly possessed, in and affecting commerce, a firearm:

(1) a Norinco, model AK-47, serial number 9305253.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).

Count 3

On or about July 30, 2015, in Sandoval County, in the District of New Mexico, the Defendant, **RICHMOND SAM**, knowingly possessed, used, carried, and discharged a firearm, a Norinco, model AK-47, serial number 9305253, during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, specifically, second degree murder as charged in Count 1 of this indictment.

In violation of 18 U.S.C. § 924(c).

FORFEITURE ALLEGATIONS

Upon conviction of the offenses alleged in this Indictment, the Defendant, **RICHMOND SAM**, shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c) any interest he may have in a Norinco, model AK-47, serial number 9305253.

A TRUE BILL:

/s/
FOREPERSON OF THE GRAND JURY

Assistant United States Attorney

PWS 8/24/2015 10:03 AM